## STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT OIL CONSERVATION DIVISION

IN THE MATTER OF THE HEARING
CALLED BY THE OIL CONSERVATION
DIVISION FOR THE PURPOSE OF CONSIDERING:

CASE NO. 11358

APPLICATION OF NEARBURG EXPLORATION COMPANY
TO TERMINATE SALT WATER DISPOSAL INTO CERTAIN
INJECTION WELLS BY RESCINDING NMOCD PERMIT SWD-336
FOR YATES PETROLEUM CORPORATION'S OSAGE WELL NO. 1
AND BY RESCINDING ORDER R-7637 FOR ANADARKO
PETROLEUM CORPORATION'S OSAGE WELL NO. 1
EDDY COUNTY, NEW MEXICO

## NOTICE OF SUBSTITUTION OF PRIMARY COUNSEL

COMES NOW, Nearburg Exploration Company, ("Nearburg") by and through its attorneys, and notifies the New Mexico Oil Conservation Division and all parties of its substitution of primary counsel and representation in this matter.

- (1) Nearburg has been represented in this matter exclusively by Colin P. Cahoon and Gerald C. Conley of the law firm of Jackson & Walker, L.L.P. Nearburg desires to retain Mr. Conley and Jackson & Walker as counsel, but hereby designates J. Randy Turner of the law firm of Turner & Davis as its primary counsel in this matter.
- (2) Mr. Turner is admitted to practice law in the state of New Mexico and the state of Texas, and has experience before the Oil Conservation Division. Nearburg respectfully requests that future correspondence and pleadings in this matter be directed to Mr. Turner at the following address:

J. Randy Turner TURNER & DAVIS 400 West Illinois, Suite 1400 P. O. Box 2796 Midland, Texas 79701 (915) 687-1735 (Telecopier) Nearburg further respectfully requests that copies of all such pleadings and correspondence be sent to Gerald C. Conley at the following address:

Gerald C. Conley JACKSON & WALKER, L.L.P. 901 Main Street Suite 6000 Dallas, Texas 75202 (214) 953-5822 (Telecopier)

(3) Mr. Turner's telephone number (915) 687-0011. Mr. Conley's telephone number is (214) 953-6003

WHEREFORE, Nearburg respectfully requests that Colin P. Cahoon be deemed withdrawn as counsel for Nearburg and that, J. Randy Turner of the law firm of Turner & Davis be substituted as primary counsel for Nearburg and that Gerald C. Conley of the law firm of Jackson & Walker, L.L.P. remain of counsel to Nearburg in this matter.

Respectfully submitted,

JACKSON & WALKER, L.L.P.

901 Main Street Suite 6000 Dallas, Texas 75202 (214) 953-6000 (214) 953-5822

Colin P. Cahoon

By:

New Mexico State Bar No. 7049

## **TURNER & DAVIS**

400 West Illinois, Suite 1400 P. O. Box 2796 Midland, Texas 79701 (915) 687-0011 (Telephone) (915) 687-1735 (Telecopier)

J. Randy Turner

New Mexico State Bar No. 4009